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7 The Honorable Ricardo S. Martinez  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CLOANTO CORPORATION, AMIGA, INC.,  
ITEC, LLC and AMINO DEVELOPMENT  
CORPORATION,

Plaintiffs,

- against -

HYPERION ENTERTAINMENT CVBA,

Defendant.

HYPERION ENTERTAINMENT CVBA

Counterclaim Plaintiff,

- against -

CLOANTO CORPORATION, AMIGA, INC.,  
ITEC, LLC and AMINO DEVELOPMENT  
CORPORATION,

Counterclaim Defendants.

Civil Action No.: 2:18-cv-00381-RSM  
(consolidated with 2:18-cv-00535)

**STIPULATED MOTION TO  
CONTINUE TRIAL DATE AND  
RELATED DATES BY SIX WEEKS  
TO FACILITATE COMPLETION OF  
SETTLEMENT DISCUSSIONS**

NOTE ON MOTION CALENDAR:  
January 20, 2021

## **STIPULATION**

Defendant/Counterclaim Plaintiff Hyperion Entertainment CVBA (“Defendant”), joined by Plaintiffs/Counter-Defendants Cloanto Corporation, Amiga, Inc., Amino Development Corporation, and Itec, LLC (“Plaintiffs”) without objection, (collectively, the “Parties”), pursuant to LCR 7(d)(1) and LCR 10(g), hereby moves the Court for an order extending, by six (6) weeks the dates in the Court’s Order of October 7, 2020 (Dkt. No. 96). Hyperion submits, and Plaintiffs accept, that there is good cause to modify the current case schedule, for the reasons set forth below.

The Parties resumed settlement discussions to resolve all of the matters between them in October 2020. On Thursday of last week, the Parties reached the terms of settlement on the main agreement. The only tasks that need to be completed are for the Parties to attend to seven ancillary documents, including an assignment and novation agreement, mutual releases, stipulations of dismissal, and documents related to a proceeding in Belgium. In addition, Hyperion requires additional time to confer on one point with counsel in Delaware regarding a security interest. The additional time requested will enable the Parties to focus exclusively on finalizing documents and following through with the settlement. Accordingly, Hyperion, without objection from Plaintiffs, respectfully requests that the Court extend the remaining deadlines as follows:

<u>Deadline/Event</u>	<u>Current</u>	<u>Proposed</u>
All dispositive motions must be filed by and Noted on the motion calendar no later than the THIRD Friday thereafter	02/05/2021	03/19/2021
Mediation per LCR 39.1(c)(3), if requested held no later than	03/17/2021	04/28/2021
All motions in limine must be filed by and noted on the motion calendar no later than the THIRD Friday thereafter	04/07/2021	05/19/2021
Agreed pretrial order due	04/22/2021	06/03/2021

1 Pretrial conference to be scheduled by  
2 the Court

3 Trial brief, proposed voir dire questions, 04/29/2021 06/10/2021  
4 jury instructions, neutral statement of the case,  
5 and trial exhibits due

6 The Parties' joint request is not sought for purposes of delay. Rather, due to the  
7 complexity of the issues for settlement, coupled by the COVID-19 crisis, the Parties believe that  
8 a six week extension is necessary to afford them the opportunity to settle all issues.

9 Respectfully submitted this Thursday, January 21, 2021.  
10

11 By /s/ Gordon E. R. Troy

12 Gordon E. R. Troy

13 *Pro Hac Vice*

Gordon E. R. Troy, PC

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14 By /s/ Eric J. Harrison

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Attorney for Hyperion Entertainment CVBA

15 By /s/ Michael G. Atkins

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16 Attorneys for Cloanto Corporation,  
17 Amiga, Inc., Amino Development Corporation,  
18 and Itec, LLC

19 **ORDER**

20 IT IS HEREBY ORDERED that the case deadlines are extended as follows:

21 **Deadline/Event**

**Current**      **Revised**

22 All dispositive motions must be filed by and  
23 Noted on the motion calendar no later than  
24 the THIRD Friday thereafter

02/05/2021 03/18/2021

25 Stipulated Motion to Continue Trial Date

Case No. 2:18-cv-00381

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**ATTORNEY WEST SEATTLE, P.S.**

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Seattle, WA 98136

(206) 388 8092

1	Mediation per LCR 39.1(c)(3), if requested held no later than	03/17/2021	04/28/2021
2	All motions in limine must be filed by and noted on the motion calendar no later than the THIRD Friday thereafter	04/07/2021	05/19/2021
3	Agreed pretrial order due	04/22/2021	06/02/2021
4	Pretrial conference to be scheduled by the Court		
5	Trial brief, proposed voir dire questions, jury instructions, neutral statement of the case, and trial exhibits due	04/29/2021	06/09/2021
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8	<b>Trial date</b>	<b>05/03/2021</b>	<b>06/14/2021</b>
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10	DATED this 21 <sup>st</sup> day of January, 2021.		
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14	<u>RICARDO S. MARTINEZ</u>		
15	CHIEF UNITED STATES DISTRICT JUDGE		
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## **CERTIFICATE OF SERVICE**

I hereby certify that on the Thursday, January 21, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Gordon E. R. Troy, [gtroy@webtm.com](mailto:gtroy@webtm.com)

By /s/ Eric J. Harrison  
Eric J. Harrison  
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